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Attorneys for Defendants State Farm Mutual
Automobile Insurance Company (erroneously
sued as State Farm Mutual, Inc.), State Farm
General Insurance Company (erroneously sued
as State Farm General Incorporated), and State
Farm Life Insurance Company

IN THE UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

CARMEL STEVENS and LADALE
JACKSON, individually and on behalf
of all similarly situated,

Plaintiffs,

v.

STATE FARM MUTUAL, INC.;
STATE FARM GENERAL
INCORPORATED; STATE FARM
LIFE INSURANCE COMPANY and
DOES 1 through 50, inclusive,

Defendants.

CASE NO. 2:22-cv-06362 FLA (MAAx)

**DECLARATION OF NASIM
KHANSARI IN SUPPORT OF
DEFENDANTS STATE FARM
MUTUAL AUTOMOBILE
INSURANCE COMPANY, STATE
FARM GENERAL INSURANCE
COMPANY, AND STATE FARM
LIFE INSURANCE COMPANY'S
RESPONSE TO COURT'S JULY 28,
2023 ORDER TO SHOW CAUSE**

Action Filed: July 6, 2022
FAC Filed: December 5, 2022
Trial Date: None set

1 I, Nasim Khansari, declare as follows:

2 1. I am an attorney duly licensed to practice law before all the courts of the
3 State of California as well as the United States District Court for the Central District of
4 California. I am an associate at the law firm Gibson, Dunn & Crutcher LLP, and am one
5 of the attorneys representing Defendants State Farm Mutual Automobile Insurance
6 Company, State Farm General Insurance Company, and State Farm Life Insurance
7 Company (collectively, "Defendants") in the above-entitled action. I provide this
8 declaration in support of Defendants' Response to the Court's July 28, 2023 Order To
9 Show Cause. Unless otherwise stated, I have personal knowledge of the matters herein,
10 and if asked to testify thereto, I would do so competently.

11 2. Not including this action, I have represented defendants in fifteen Unruh
12 Act cases that were based on claims of race discrimination. Fourteen of those cases were
13 in arbitration and one case was in federal court. Over the past two years, five of these
14 Unruh Act arbitrations resulted in attorneys' fees awards to plaintiffs. In these five
15 arbitrations, I reviewed and contested plaintiffs' requests for attorneys' fees, including
16 their billing records and hourly rates. In these arbitrations, the plaintiffs requested fee
17 awards for time spent conducting lay witness depositions, expert depositions, and
18 drafting various motions, including motions for summary adjudication.

19 3. Based on my experience defending Unruh Act claims, including my
20 experience reviewing fee requests and fee awards, and my familiarity with the
21 allegations made in this action, the estimate that Plaintiffs' counsel will spend at least
22 256 hours to litigate this case through trial is reasonable and, in fact, conservative.

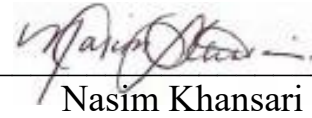
23 4. Based on my experience defending Unruh Act claims, including my
24 experience reviewing fee requests and fee awards, and my familiarity with the
25 allegations made in this action, the estimate that Plaintiffs' counsel could receive a fee
26 award calculated using an hourly rate of at least \$750 is also reasonable.

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1 I declare under penalty of perjury under the laws of the United States of America
2 that the foregoing is true and correct.

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4 Executed on this 10th day of August, 2023, at Long Beach, California.

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Nasim Khansari